

# Federal Defenders OF NEW YORK, INC.

Southern District  
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Southern District of New York  
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January 28, 2022

**VIA ECF**

Honorable George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Sandra Maria De Oliveira Lindo  
18 Cr. 782 (GBD)

Dear Judge Daniels:

I write with consent of the Government and Pretrial Services to respectfully request that the Court modify the conditions of Ms. Sandra Lindo's bail to permit her to travel domestically for work with advance permission from Pretrial Services.

On October 7, 2020, Magistrate Judge Moses imposed the following bail conditions: a \$300,000 personal recognizance bond to be cosigned by two financially responsible persons and secured by her son's home in Pembroke, GA; travel restricted to the Southern and Eastern Districts of New York, and the Northern and Southern Districts of Georgia; surrender of travel documents with no new applications, and curfew enforced by ankle monitoring.

Ms. Lindo has a new job working as a solar panel independent contractor with POWUR. POWUR works nationwide and Ms. Lindo needs the ability to travel to different states within the continental United States for her sales. Ms. Lindo has adhered to her bail conditions perfectly. I have spoken with Assistant United States Attorney Stephanie Lake on behalf of the Government, and she does not object to this request. United States Pretrial Officer Amanda Hornbeck also has no objection.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/  
Zawadi Baharanyi  
Assistant Federal Defender  
Tel.: (212) 417-8735

SO ORDERED:

*JAN 31 2022 George B. Daniels*  
HONORABLE GEORGE B. DANIELS  
United States District Judge